

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF NEW YORK

ANDREA J. NUSSINOW,

Plaintiff,

-against-

COUNTY OF COLUMBIA, RONALD PEREZ, as
President of the Columbia-Greene Humane Society,
Inc., and in his individual capacity, LEE DELISLE,
as Chief Investigator for the Columbia-Greene
Humane Society, Inc., and in his individual
capacity, and COLUMBIA-GREENE HUMANE
SOCIETY, INC., doing business as the Columbia-
Greene Humane Society/SPCA,

Defendants.

AFFIDAVIT

Case No.: 1:19-cv-332

(FJS/CFH)

State of New York }
County of Albany } ss.:

Thomas K. Murphy, being duly sworn, deposes and says:

1. I am an attorney duly licensed to practice law in the State of New York and am a member of the law firm of Murphy Burns LLP, attorneys for defendant, County of Columbia, and am fully familiar with the facts and the procedural history of this action.

2. I submit this Affidavit and the accompanying Memorandum of Law in support of defendant County of Columbia's Motion to Dismiss pursuant to Fed. R. Civ. P. 12(b)(6).

WHEREFORE, the defendant, County of Columbia, requests that the Court dismiss plaintiff's Complaint as against it pursuant to Fed. R. Civ. P. 12(b)(6).

MURPHY BURNS LLP

By: 

Thomas K. Murphy

Bar Roll No.: 505396

Attorneys for Defendant County of Columbia

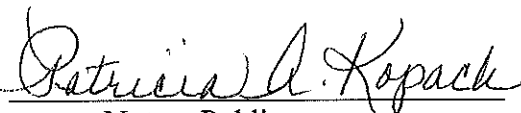
407 Albany Shaker Road

Loudonville, New York 12211

Telephone: 518-690-0096

Email: tmurphy@murphyburnslaw.com

Sworn to before me this
15th day of May, 2019.



Notary Public

PATRICIA A. KOPACH
Notary Public, State of New York
No. 01KO6136427
Qualified in Albany County
Commission Expires Nov. 07, 2021